

EX PARTE OR LATE FILED

U S WEST, Inc.
Suite 700
1020 Nineteenth Street, NW
Washington, DC 20036
202 429-3106
FAX 202 296-5157

DOCKET FILE COPY ORIGINAL

DOCKET FILE COPY ORIGINAL
USWEST

Cyndie Eby
Executive Director-
Federal Regulatory

May 23, 1997

RECEIVED

MAY 23 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

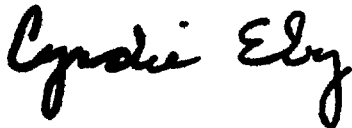
RE: Implementation of the Local Competition Provisions of the
Telecommunications Act of 1996, CC Docket 96-98

Dear Mr. Caton:

Today the attached material was delivered to Kalpak Gude, attorney of
Policy and Programming Planning Division of the Common Carrier
Bureau.

In accordance with Commission Rule 1.1206(a)(1), the original and one copy
of this summary of the presentation is being filed with your office.
Acknowledgment and date of receipt are requested. A copy of this
submission is provided for this purpose. Please contact me if you have
questions.

Sincerely,



Attachment

No. of Copies rec'd
List ABCDE

0+1

U S WEST, Inc.
Suite 700
1020 Nineteenth Street, NW
Washington, DC 20036
202 429-3106
FAX 202 296-5157



Cyndie Eby
Executive Director-
Federal Regulatory

May 23, 1997

Mr. Kalpak Gude
Policy and Programming Planning Div.
Federal Communications Commission
1919 M Street N.W., Room 544
Washington, D.C. 20554

RE: Implementation of the Local Competition Provisions of the
Telecommunications Act of 1996, CC Docket 96-98

Dear Mr. Gude:

On May 28, 1997, Robert Van Fossen will represent U S WEST Communications on the pre-ordering panel at the FCC Forum on Operations Support Systems. Per your request, I am providing Mr. Van Fossen's prepared comments in advance of the Forum.

If you have any questions please feel free to call me.

Sincerely,

A handwritten signature in cursive script that reads "Cyndie Eby".

Attachment

Speaker: Rob Van Fossen
Representing: U S WEST Communications
Topic: Pre-ordering Prepared Comments
Occasion: FCC Forum on Operations Systems Unbundling
Date: May 28-29, 1997

The subject of our Panel today is "Pre-ordering," and the activities and safeguards necessary to ensure non-discriminatory access to Operations Systems in this area. U S WEST, pre-ordering consists of:

- customer record retrieval
- address verification
- service availability verification
- facility availability verification
- telephone number assignment
- appointment reservation

U S WEST Communications has invested a significant amount of effort since the release of the FCC First Order last August in defining and implementing preorder transactions, for both its Interconnection Mediated Access gateway and in the creation of specifications for an EDI gateway. What we have found are some fundamental misconceptions in how preorder transactions are thought about in relation to the ordering process, and some problems that could arise as a result of these misconceptions.

The line between preordering tasks and ordering tasks, for the purposes of Resale or Unbundling, is very thin. The idea that preordering is a set of tasks separate and distinct from ordering is inaccurate. The concept of independence stems from the adaptation of telephony ordering (and preordering) processes to the EDI model, in ways that do not always maintain the integrity of the original business model. Rather, I would offer that the preordering and ordering transactions are co-dependent in quality, such that the quality and timeliness of order fulfillment (i.e., the provisioning of service for the end customer) is critically dependent on the quality of the preordering transactions, and vice versa.

Let's take the example of the pre-order transaction to validate the service address for the customer. Addresses are widely recognized to be very difficult to match. The customer service representative together with the aid of the customer select from multiple similar definitions of addresses to identify the proper location of the customer. Collectively, the industry would be overwhelmed with service issues if there were inaccurate communication between the ILEC and the CLEC on the customer address as part of the order. The use of the pre-order address validation transaction can prevent this problem.

Conversely, the quality of several of the pre-order transactions are also dependent on timely knowledge about what is being ordered. Let's use another example, in this case the capability to accurately estimate the work effort required to install the service. As companies continue to work on the efficiency of the Field Technician, jobs are scheduled in higher and higher levels of granularity, with almost no "buffer time" in between. The job of scheduling the calendar is no longer "hit or miss," in the fashion of red, yellow and green lights. Complex software has been developed, based on specific information contained in the service order to determine the length of the job and the next available appointment. Any scheduling conducted without order information is at best a guess. This kind of uninformed scheduling could result in missed appointments, or in customers'

appointments being pushed to a later date when in fact they could have been worked in a smaller interval.

This quality codependency needs to be accounted for in our gateway systems designs and in our work on national standards for pre-ordering. Digressing for just a moment, I'd like to make a point on the national standards work in this area of pre-order. The standards work on pre-ordering needs to be worked as aggressively as ordering has been to date. The work on ordering via a Local Services Request (LSR) has flown through the standards processes with a speed previously unheard of in recent times. The pre-ordering transactions, on the other hand, have taken second priority, and are not scheduled to be issued until about the third quarter of this year. While I'm not challenging the relative priority of ordering versus pre-ordering, we do have to work these two subjects together in parallel. In the mean time, ILECs and CLECs are forced to develop proprietary solutions, which will eventually cause rework as standards are developed.

Without diminishing in any way the importance of the quality of access to Operations Systems, it is clear that in the end, non-discriminatory treatment will be measured in terms of service that is provided the end customer. As we go forward, choices that are made in how pre-order transactions are conducted will have a significant impact on the quality of service to that customer.

---//---